



ECOLOGY CENTER  
OF SOUTHERN CALIFORNIA

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3624 '99 MAY 19 P1:22

May 13, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

Re. Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To whom it may concern:

The nationwide members of the Ecology Center give our full support to the recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods. That recommendation stated, "any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Irradiation labels, like any other labels, are required by the FDA to be truthful and not misleading. Therefore, we believe that the terms "treated by irradiation" or "treated with radiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is a process of rapid heating and cooling, and, therefore, an entirely different process than irradiation.

The requirement for irradiation disclosure (both label and radura) should NOT expire at any time in the future. The material fact of processing remains. While we recognize the radura as information regarding a material fact of food processing, and even if more consumers become familiar with the radura, new consumers will not be. The symbol should be clearly understandable at the point of purchase for everyone, and if there is no label, consumers will be misled into believing the food has not been irradiated.

We urge you to extend the comment period past its current end date of May 18 to allow more concerned citizens to write in about this issue. We would also urge you to post the comments received on the Internet so that the public can be informed about who is participating in this comment process.

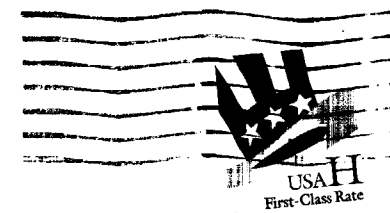
Sincerely,

*Anna Harlowe*  
Anna Harlowe  
Issues Coordinator

98N 1038

C2153

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